

UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION

IN RE:)
)
ROCKFORD PRODUCTS CORPORATION) CASE NO. 07-71768-TML
)
Debtor(s))

**APPLICATION OF TRUSTEE'S COUNSEL
FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES**

TO: THE HONORABLE BANKRUPTCY JUDGE

Daniel M. Donahue, counsel for the Trustee pursuant to 11 U.S.C. §330 and FRBP 2016 submits this application for compensation and reimbursement of expenses and represents to the Court as follows:

1. An order for relief under Chapter 7 was entered on July 25, 2007. This Court on January 28, 2008 authorized the employment of the Applicant to serve as counsel for the Trustee. Counsel has received \$156,372.69 in previously awarded compensation and reimbursement of expenses of \$1,449.69.

2. Applicant requests \$180,468.00 in compensation for 85 hours of services performed for the period November, 2014 to the current date, and reimbursement of actual expenses in the amount of \$233.71.

3. Attached as Exhibit "A" is an itemized statement of the legal services rendered. The statement reflects the legal services rendered, the person who performed those services and a description of the work performed.

4. The time expended and services rendered by Applicant is summarized as follows:

<u>Attorney</u>	<u>Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Daniel M. Donahue	83.2	\$300.00	\$24,960.00
Donald Q. Manning	1.8	\$325.00	<u>\$ 585.00</u>
			\$25,545.00

5. Attached as Exhibit "B" is an itemized statement of the actual expenses incurred by the Applicant.

6. Based upon the nature, extent and value of the services performed by the Applicant, the results achieved, and the costs of comparable services, the compensation and reimbursement of expenses sought are fair and reasonable.

EXHIBIT F

7. At all times during Applicant's representation of the Trustee, Applicant was a disinterested person and neither represented nor held an interest adverse to the estate with respect to the matters on which Applicant was employed.

WHEREFORE, Applicant requests that it be awarded reasonable compensation of \$180,468.00 and reimbursement of actual and necessary expenses of \$233.71 for legal services rendered in this case.

Respectfully Submitted,

Dated: 8/19/16

/s/ Daniel M. Donahue

DANIEL M. DONAHUE, Trustee
McGREEVY WILLIAMS
6735 VISTAGREEN WAY
ROCKFORD, IL 61107
(815) 639-3700

EXHIBIT A		
ROCKFORD PRODUCTS CORPORATION; 07-71768		
FEES		
A. GENERAL SERVICES		
DANIEL M. DONAHUE:		
11/14/2014	0.60	Work on fee request
12/15/2014	0.70	Attend hearing on fees
12/17/2014	0.50	Correspondence from IRS and work on response to demand regarding foreign entity
12/18/2014	0.50	Research on tax problems
12/22/2014	0.20	Voice mail from accountant regarding IRS response
12/22/2014	0.40	Extended telephone conference with accountant regarding solutions
12/30/2014	0.30	Review response to IRS
1/21/2015	0.20	Correspondence from IRS regarding return dispute
3/30/2015	0.50	Correspondence to IRS; correspondence to accountant regarding delayed response from IRS
4/13/2015	0.10	Email from accountant regarding IRS position
4/27/2015	0.40	Correspondence to IRS and correspondence to accountant regarding dispute
4/30/2015	0.30	Correspondence to IRS regarding late claim and account history
5/4/2015	0.20	Revise correspondence to IRS regarding accounting
5/26/2015	0.30	Correspondence from IRS regarding response
2/1/2016	0.30	Voice mails with accountant regarding IRS dispute
TOTAL - 5.5 hrs @ \$300./hr = \$1,650.00		
B. ADVERSARY - ROOF CLAIM		
DANIEL M. DONAHUE:		
1/12/2015	1.00	Attend hearing and conference with Attorney Sandberg on roof issue
1/20/2015	0.40	Review settlement proposal from administrative claimant
2/4/2015	0.60	Work on counter-offer to Sandberg proposal
2/5/2015	0.20	Voice mail from Attorney Sandberg regarding offer
2/5/2015	0.20	Telephone conference with Attorney Sandberg regarding proposal
2/5/2015	0.90	Work on response and check Sandberg's client's pleadings
2/6/2015	0.30	Telephone conference with Attorney Sandberg regarding withdrawal of claim and memorandum regarding same
2/9/2015	1.00	Attend hearing on administrative claim and withdrawal of same without prejudice
TOTAL - 4.6 hrs @ \$300/hr = \$1,380.00		
C. WORK ON PRIORITY AND ADMINISTRATIVE CLAIMS		
DANIEL M. DONAHUE:		
5/22/2015	1.40	Review Pension Benefit Guaranty materials

7/2/2015	0.60	Review research materials on pension claim
8/20/2015	0.40	Pension Benefit Guaranty Board materials review
8/24/2015	0.40	Work on demand regarding Pension Benefit Guaranty Board
11/25/2015	0.60	Work on PBGB resolution
12/1/2015	1.20	Work on PBGB research on priority and administrative
12/3/2015	0.60	Review backup materials on research
12/16/2015	0.30	Follow-up on lack of response
12/17/2015	0.50	Resend request for clarification regarding PBGB
1/11/2016	0.60	Work on claim objection of PBGB
1/12/2016	1.40	Continue with objections to claims (PBGB)
1/13/2016	0.20	Revisions to objections (PBGB)
1/14/2016	0.70	Additional revisions to objection and draft order
1/19/2016	0.60	Finalizing motion and order
2/5/2016	0.80	Begin working on proposal on claim objections (PBGB)
2/8/2016	0.50	Review updated information from PBGB
2/10/2016	0.50	Proposal for settlement
2/11/2016	0.60	Email and additional materials from PBGB
2/12/2016	0.60	Check on third PBGB claim as a basis for a possible settlement
2/15/2016	0.50	Telephone conference with attorney for PBGB and memorandum regarding proposal
2/17/2016	0.20	Revise motion regarding objections to Pension Benefit Guaranty Corporation claims
2/17/2016	0.60	Email and review further materials from Pension Benefit Guaranty Corporation
2/18/2016	1.20	Draft proposed settlement motion
2/18/2016	0.80	Review motion and work on settlement proposal
2/19/2016	0.60	Review draft settlement agreement
2/22/2016	1.00	Attend hearing on PBGB settlement
2/22/2016	0.50	Revise Order and email to attorney for corporation
2/23/2016	1.10	Review Order; Email to attorney for Pension Benefit Guaranty Corporation regarding changes to Order
2/23/2016	0.40	Check dates and amounts in order
2/23/2016	0.80	Work on priority claim objections
2/24/2016	1.40	Review case dockets for administrative and/or priority claim issues
2/24/2016	0.40	Telephone conference with attorney for Pension Benefit Guaranty Corporation for possible late filed claim issue
2/29/2016	0.70	Work on priority claims
2/29/2016	0.80	Pension Benefit email from attorney for corporation Review additional materials Voice mail and emails
3/1/2016	0.30	Email to and from counsel regarding changes to Order
3/1/2016	0.30	Revise order per PBGB request
3/3/2016	0.40	Emails regarding final revised order
3/4/2016	1.40	Work on objections to priority claims (approximately 12)
3/4/2016	0.30	Correspondence to Amcore Bank's counsel regarding objection to their \$5.5 million claim
3/6/2016	0.30	Revise letter to Amcore, trustee
3/6/2016	0.70	Continue work on objections

3/7/2016	1.10	Attend hearing on PBGB
3/7/2016	0.60	Revise objections with updated material
3/7/2016	0.30	Work on proposed order for priority objections
3/7/2016	0.60	Work on regular objections
3/10/2016	0.30	Revise letter to Amcore regarding priority claim
3/22/2016	0.60	Work on objections
3/22/2016	2.40	Work on omnibus objection (dealing with approximately 80 claims)
3/28/2016	1.20	Omnibus objection updates
3/29/2016	1.40	Omnibus objection/cross-checking
3/30/2016	2.30	Continue with omnibus objection
3/31/2016	2.70	Omnibus objection/fine tune
4/4/2016	2.10	Work on objections not in omnibus
4/6/2016	2.60	Omnibus objection/add in more duplicates
4/11/2016	0.60	Work on claims objection regarding Amcore priority
4/12/2016	1.40	Continue work on all objections (spreadsheets)
4/13/2016	2.20	Continue work on objection
4/14/2016	1.70	Objections /pension claims by individuals
4/15/2016	2.20	Work on objections/pension
4/18/2016	2.60	Work on objections/pension
5/23/2016	2.80	Omnibus objection/checking consistency
5/26/2016	1.60	Objections on claims for 503(b)(9)
6/3/2016	1.80	Work on Peterman UPS issue
6/8/2016	2.10	Attend hearing on claim objections
6/13/2016	1.40	Pension claim objection
6/15/2016	2.20	Continue with pension objections
6/16/2016	1.40	Further work on pension objections research
6/20/2016	2.60	Revise pension objection and look into class action lawsuit overlap
7/1/2016	1.20	Continue work on remaining pension objections
TOTAL - 73.10 hrs @ \$300./hr = \$21,930.00		
DONALD Q. MANNING		
7/11/2016	0.30	Review memo regarding remaining employee claims
7/11/2016	1.50	Court appearance on claim objections
TOTAL - 1.8 hrs @ \$325./hr = \$585.00		
FEES:		
DANIEL M. DONAHUE		\$24,960.00
DONALD Q. MANNING		\$585.00
TOTAL		\$25,545.00

ROCKFORD PRODUCTS CORPORATION; 07-71768
EXPENSES

DATE	AMOUNT	NARRATIVE
10/31/2013	0.45	Photocopies
11/21/2014	12.28	Postage for service of 8th Fee Application
11/21/2014	16.8	Photocopies
12/16/2014	0.3	Photocopies
12/18/2014	0.9	Photocopies
12/29/2014	0.3	Photocopies
12/29/2014	0.15	Photocopies
1/14/2015	0.15	Photocopies
1/15/2015	0.75	Photocopies
1/15/2015	0.15	Photocopies
2/3/2015	1.05	Photocopies
4/14/2015	0.15	Photocopies
5/4/2015	0.15	Photocopies
5/12/2015	0.75	Photocopies
5/12/2015	1.2	Photocopies
5/18/2015	0.15	Photocopies
1/21/2016	12.6	Photocopies
1/21/2016	13.27	Postage for service of objection of PBGC claim
4/18/2016	27.21	Postage for service of Omnibus Objection
4/18/2016	61.05	Photocopies
4/20/2016	12.08	Postage for service of multiple individual claim objections
4/20/2016	20.4	Photocopies
4/21/2016	17.7	Photocopies
4/21/2016	13.16	Postage for service of multiple claim objections
5/6/2016	6.04	Postage for service of multiple claim objections
5/6/2016	7.8	Photocopies
5/6/2016	6.72	Postage for service of Objection to Claims
TOTAL	\$233.71	

ROCKFORD PRODUCTS CORPORATION
07-71768

The bulk of the work related to wrapping up the estate dealt with resolving claims. There were 363 claims filed, many of which contained requests for priority treatment. The resolution of the claims seeking recovery related to pension contributions was particularly thorny given the interaction among the rights of the Pension Benefit Guaranty Corporation, the effect of the District Court litigation brought by former employees against Plan trustees and a number of priority claims based on a non-recoverable drop in the value of the stock. The result, ultimately, was a reduction in priority claims by many millions of dollars which allowed the estate to make a distribution to unsecured creditors. Trustee prepared an omnibus objection dealing with basic claim problems that resolved 72 claims and filed 49 individual objections which resolved numerous claims.

Summary of Professional Fees

Professional		Previous Allowances	Pending Applications	Total Fees And Expenses
<u>Trustee's Attorney</u>				
McGreevy Williams	<i>Fees</i>	\$154,923.00	\$25,545.00	\$180,468.00
	<i>Expenses</i>	\$1,449.69	\$233.71	\$1,683.40
<u>Trustee's Accountants</u>				
Wipfli, Llp	<i>Fees</i>	\$23,650.25	\$5,986.25	\$29,636.50
	<i>Expenses</i>	\$0.00	\$0.00	\$0.00
<u>Other Professionals</u>				
None	<i>Fees</i>	\$0.00	\$0.00	\$0.00
	<i>Expenses</i>	\$0.00	\$0.00	\$0.00
Totals	<i>Fees</i>	\$154,923.00	\$25,545.00	\$180,468.00
	<i>Expenses</i>	\$1,449.69	\$233.71	\$1,683.40
		\$156,372.69	\$25,778.71	\$182,151.40